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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CASEY ROBERTS, Individually and On Behalf of All Other Similarly Situated,

No. 3:19-cv-03422-SI

V.

Plaintiff.

ZUORA, INC., TIEN TZUO, and TYLER SLOAT.

Defendants.

**JOINT STIPULATION AND
[PROPOSED] SCHEDULING ORDER
EXTENDING EXPERT DISCOVERY
AND DISPOSITIVE MOTION
DEADLINES**

Judge: Hon. Susan Illston
Dept.: Courtroom 1, 17th Floor
Date Action Filed: June 14, 2019

Pursuant to Civil Local Rule 6-2(a), Lead Plaintiff New Zealand Methodist Trust Association and Defendants Zuora, Inc., Tien Tzuo, and Tyler Sloat (collectively, "the Parties") respectfully submit this Joint Stipulation Requesting an Order to Extend Expert Discovery and Dispositive Motion Deadlines. Good cause supports this request for relief.

WHEREAS, on April 4, 2022, this Court entered a scheduling order (Dkt. 139) setting, among other pre-trial deadlines, the deadlines for expert discovery and dispositive motion briefing and hearing.

WHEREAS, Plaintiffs have recently learned that key members of Plaintiffs' expert witness team will be taking extended leaves overseas during the summer months of 2022 when opening and rebuttal expert reports are presently scheduled to be exchanged.

WHEREAS, in light of the foregoing, the Parties have agreed, subject to approval by the Court, to extend expert discovery and dispositive motion deadlines by approximately 30 days, as set forth in the proposed modified schedule below.

ACTION	EXISTING DEADLINE	[PROPOSED] DEADLINE
Expert Reports Exchanged	July 1, 2022	August 5, 2022
Rebuttal Expert Reports Exchanged	August 5, 2022	September 9, 2022
Expert Discovery Cutoff	September 9, 2022	October 14, 2022
Dispositive Motion(s) Filed	October 14, 2022	November 18, 2022
Opposition(s) to Dispositive Motion(s)	November 11, 2022	December 16, 2022
Reply ISO Dispositive Motion(s)	December 2, 2022	January 13, 2023
Hearing on Dispositive Motions	December 16, 2022	TBD

WHEREAS, the Parties believe that the requested modifications will not have any effect on the rest of the case schedule, including the previously Court-ordered dates for Pretrial Paperwork (April 11, 2023), Final Pretrial Conference (April 25, 2023), and Jury Trial and Selection (May 8,

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1 2023).

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3 **IT IS SO STIPULATED.**

4 Dated: May 20, 2022

5 HAGENS BERMAN SOBOL SHAPIRO LLP

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28 JOINT STIPULATION AND [PROPOSED] SCHEDULING
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1 Dated: May 20, 2022

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28 JOINT STIPULATION AND [PROPOSED] SCHEDULING
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SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), all signatories concur in filing this Joint Stipulation Extending Expert Discovery Schedule.

Dated: May 20, 2022

HAGENS BERMAN SOBOL SHAPIRO LLP

By: _____ */s/ Steve W. Berman*
Steve W. Berman

Attorneys for Lead Plaintiff New Zealand Methodist Trust Association

JOINT STIPULATION AND [PROPOSED] SCHEDULING
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[PROPOSED] ORDER

Pursuant to the Parties' stipulation, and good cause appearing therefor, the Parties' request to extend expert discovery and dispositive motion deadlines is hereby **GRANTED**.

The new deadlines for expert discovery and dispositive motion briefing and hearing are as follows:

ACTION	PRE-TRIAL DEADLINE
Expert Reports Exchanged	August 5, 2022
Rebuttal Expert Reports Exchanged	September 9, 2022
Expert Discovery Cutoff	October 14, 2022
Dispositive Motion(s) Filed	November 18, 2022
Opposition(s) to Dispositive Motion(s)	December 16, 2022
Reply ISO Dispositive Motion(s)	January 13, 2022
Hearing on Dispositive Motions	TBD February 23, 2023

The previously Court-ordered dates for Pretrial Paperwork, Final Pretrial Conference, and Jury Trial and Selection shall remain unchanged.

IT IS SO ORDERED.

Dated: May 23, 2022



The Honorable Susan Illston
United States District Court Judge